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Via ECF

The Honorable David S. Jones
United States Bankruptcy Judge
One Bowling Green
New York, NY 10004-1408

Re: *In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DSJ)*

Dear Judge Jones:

We represent Ninety-Five Madison Company, L.P., the debtor and debtor-in-possession (the “Debtor”) in the above-referenced chapter 11 case. We write to request the appointment of a judicial mediator (the “Mediator”) to help the parties resolve certain issues between the Debtor and Carol E. Keller and Gail Shields as Preliminary Executors of the Estate of Lois Weinstein (the “Weinstein Estate,” and together with the Debtor, the “Parties”).

The Parties have agreed to mediate any issues concerning the *Combined Chapter 11 Plan of Reorganization and Disclosure Statement for Debtor Ninety-Five Madison Company, L.P.* [Dkt. No. 274] and the Parties’ claims against one another (the “Claims”). Such Claims include, but are not limited to, the proof of claim filed by the Weinstein Estate (*see* Proof of Claim No. 9) and claims relating to the adversary proceeding commenced by the Debtor against Kinder Realty Associates and the Weinstein Estate. *See Ninety-Five Madison Company, L.P. v. Kinder Realty Assocs. et al.*, Adv. Pro. No. 22-01001.

The Debtor respectfully requests that Your Honor appoint Judge Sean J. Lane of the United States Bankruptcy Court for the Southern District of New York as the Mediator, subject to his availability to serve in such capacity. Judge Lane previously presided over this chapter 11 case and, after being transferred to the White Plains Division, mediated issues between the Debtor and Vitra, Inc. He is, therefore, well acquainted with the history of this chapter 11 case and the issues between the Parties.

We are available to discuss this matter at the Court’s convenience.

Respectfully submitted,



Andrew K. Glenn

cc: All Counsel of Record (via ECF)
Mr. Jeffrey A. Barr
Mr. Michael Sklar
Ms. Sharan Sklar
Ms. Rita Sklar